



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

July 21, 2008

Chief, Rulemaking, Directives and Editing Branch
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, D.C. 20555-0001

Re: EPA Review and Comments on Draft Generic Supplemental Environmental
Impact Statement (DGSEIS) for the Susquehanna Stream Electric Station, Units 1
and 2 (Report Number NUREG-1437, Supplement 35)

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA), Region 3, reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The purpose of the letter is to provide the Nuclear Regulatory Commission (NRC) with EPA's comments regarding the potential impacts of the renewal of the operating license (OL) for the Susquehanna Stream Electric Station, Units 1 and 2.

As you are aware, the proposed action of renewing the OL for a 20-year period (i.e., until July 17, 2042, Unit 1 and March 23, 2044, Unit 2) would maximize the use of existing assets. If the OLs are renewed, State regulatory agencies and Pennsylvania Power and Light Company – Susquehanna, LLC (PPL) will ultimately decide whether the plant will continue to operate based on factors such as the need for power or other matters within the State's jurisdiction or purview of the owners. If the OLs are not renewed, then the units must be shut down at or before the expiration dates of the current OLs, which are July 17, 2022, for Unit 1, and March 23, 2024, for Unit 2.

PPL Susquehanna, LLC operates Susquehanna Stream Electric Station, Unit 1 and 2 in northeastern Pennsylvania under NRC OLs NPF-014 and NPF-022, respectively. The facility has two General Electric-designed boiling-water reactors, each with a current power level of 3439 megawatts thermal (MW(t)) and a net power of 1135 megawatts electric (MW(e)), though the facility has recently received approval for an extended power uprate allowing an increase of each unit's power level to 3552 MW(t), or approximately 1300 MW(e) per unit. The plant cooling is provided by a closed-cycle heat dissipation system that dissipates heat primarily to the air. Unit 1 and 2 produce electricity to supply the needs of roughly 2 million homes.

As part of the NEPA review process, EPA has developed a set of criteria for rating

Draft GSEIS. The two part criteria system rates Draft EISs from both an environmental and adequacy perspective. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the Draft GSEIS (see attachment for additional information about the EPA rating system criteria or at:

www.epa.gov/compliance/nepa/comments/ratings.html). Based on our review of the DGSEIS for the Susquehanna Stream Electric Station, Units 1 and 2, EPA has rated this DGSEIS as EC-1 Environmental Concerns, Adequate Information. In the DGSEIS the NRC staff concluded that the potential impacts on historic and archaeological resources could be moderate and have made recommendations to PPL to mitigate impacts by:

1. developing and implementing improved procedures or by examining the entire plant site for historic and archaeological resources
2. include Section 106 training to PPL staff to ensure that informed decisions are made when considering the effects of projects
3. any changes made to the historic and archaeological resources assessments should be coordinated with the Pennsylvania Historical and Museum Commission

Further, the DGSEIS identified EPA's Office of Pollution Prevention and Toxics, Pollution Prevention Clearinghouse can be used as a source for opportunities for waste minimization and pollution prevention. EPA concurs with the above NRC's staff recommendations.

EPA appreciates the opportunity to submit comments on the DGSEIS. EPA welcomes the chance to continue working with NRC. My staff is ready to continue to participate, as necessary, to assist NRC in the completion of the NEPA analysis for this project. Please feel free to contact me or Kevin Magerr at 215 814 5724, if you wish to discuss these comments further.

Sincerely,



William Arguto,
NEPA Team Leader
Office of Environmental Program

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental **impact(s)** of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of **clarifying** language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to **fully** assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional **information**, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially **significant** environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially **significant** environmental impacts. EPA believes that the identified additional information, data, analysis, or discussions are of such a magnitude that they should have full public review at a **draft** stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA **and/or** Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised **draft** EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."